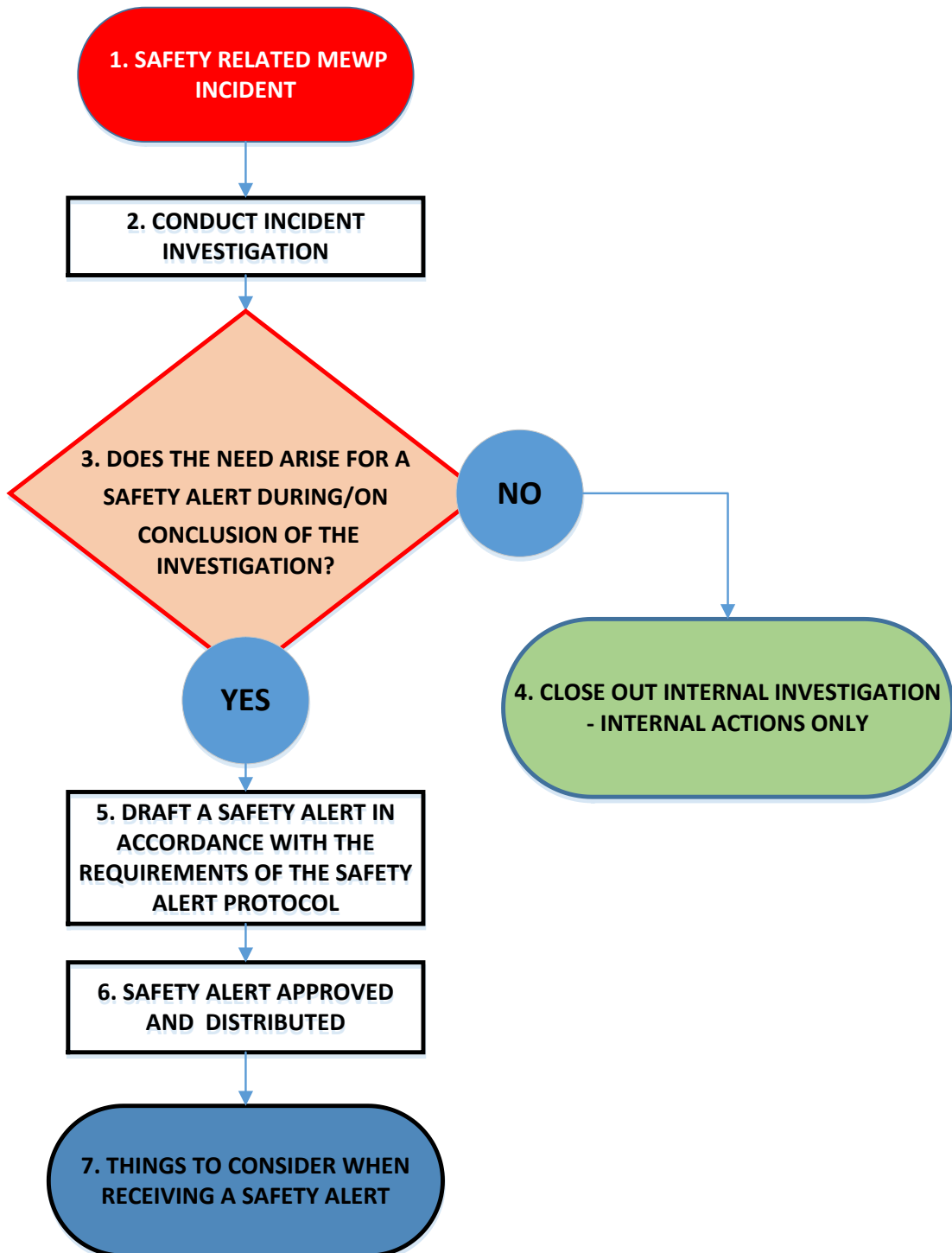


MEWP Safety Alert Protocol



The purpose of this guidance is to develop a standard approach to the generation and circulation of safety alerts in the MEWP industry.



MEWP Safety Alert Protocol



Introduction

The circulation of factually incorrect, misleading or poorly written information contained in a safety alert can and does repeatedly cause unnecessary confusion within the industry. Once issued the author loses control of the document, as it is passed from company to company around the world, often being re-issued or rebranded with a different company letter head and frequently re-appearing years after it was first issued.

In some cases, the misinformation can have the opposite effect to that intended by the author. It may negatively affect confidence with a specific machine or manufacturer, which may ultimately compromise safety in the workplace. It is vitally important to prevent such situations in order to maintain the highest levels of safety and eliminate the unnecessary time and resource wasted trying to address outdated or unfounded concerns.

This MEWP safety alert protocol has been developed by the Strategic Forum MEWP Safety Group to help prevent such situations. The intention is to provide clear, concise guidance and a template to those considering issuing a safety alert, following a MEWP related incident, as well as those considering forwarding a safety alert they have received to others. Whilst this protocol is primarily written for those considering issuing safety alerts to third parties, organisations may also want to consider its use for internal purposes.

The definition and intended purpose of a MEWP safety alert is:

A communication distributed, following an incident, to share known facts and learning, during or following an investigation - where others may benefit from distribution of the learning experience.

The flow chart on page 1 and the related guidance below outline the recommended procedure for anyone who is considering generating and circulating a MEWP related safety alert.

1. SAFETY RELATED MEWP INCIDENT

Those involved in a MEWP related incident, which may compromise their or others safety, should report it immediately to their line manager/employer to ensure that corrective actions can be taken to prevent injury, or occurrence of a similar incident.

2. CONDUCT INCIDENT INVESTIGATION

It is important that any MEWP related incident is fully investigated. This may involve contacting those with a contractual, or specialist interest, such as the owner, relevant rental company and the MEWP manufacturer. Where appropriate they should all be directly involved in the investigation process.

Depending on the seriousness and nature of the incident it may also require notification to the relevant enforcement authority in accordance with RIDDOR. <http://www.hse.gov.uk/riddor/> . In such cases and where reasonably practicable, consideration should be given to preservation of the scene/evidence, until contact has been made with the enforcing authority.

Consideration should also be given to seeking help and advice from appropriate industry related bodies. It is also good practice to ensure that all MEWP related incidents are reported to the IPAF incident reporting database www.ipaf.org/accident.

3. DOES THE NEED ARISE FOR A SAFETY ALERT DURING / ON CONCLUSION OF THE INVESTIGATION?

There is no requirement to automatically produce a safety alert following a MEWP related incident. The majority of investigations will not lead to a safety alert being issued. The following two tables identify a number of factors for consideration when deciding whether or not to proceed with producing and distributing a safety alert. Each point is not mutually exclusive but all the factors need to be considered collectively in order to make a balanced decision.

| |
|--|
| Factors AGAINST issuing a safety alert: |
| An adequate level of investigation has not been carried out |
| The information relevant to the incident is unreliable |
| The information is supposition |
| Incident investigation identifies non-compliance with operational standards or good practice guidance, which can be communicated to an identified and limited audience by other means. |
| Someone or some organisation is better placed and more informed to send out the information |
| The information is already in public domain |
| Where relevant, the owner, rental company and or manufacturer has not been contacted and made aware of the incident |
| Knowledgeable/interested parties are justifiably contesting the factual content or recommendations |
| The alert is only being issued due to unjustifiable pressure from outside influences |
| Standing down of machines internally during preliminary investigations. This is a restricted company internal communication, not a safety alert. |
| The document discusses or apports blame |
| |
| Factors FOR issuing a safety alert: |
| The information is reliable |
| The information is factual and can be substantiated |
| Issuing the alert may reduce the likelihood of a similar incident |
| There is potentially serious risk to others if the information is not shared without delay |
| The potential consequences from a similar incident are severe |
| The risk and consequences of not controlling the risk are clearly stated |
| Recommendations for action are proportionate to the identified risk |
| Where it is identified that intentional defeating of safety device has been identified as widespread and regular |
| The owner, rental company and or manufacturer have been contacted and are aware of the incident and the intention to produce a safety alert |
| It is relevant to others and these persons/organisations have been clearly identified |
| It states why it has been circulated and identifies expected actions |
| Legal requirements, standards and good practice guidance if included, are accurate and correctly referenced |
| It is accepted that the alert may be distributed in a public forum |
| Where the issuing of an alert may prompt other owners/users to disclose factual information relating to previously unreported incidents of a similar nature to the supplier/manufacturer |

4. NO – Close out Internal investigation – internal actions only

If after considering all the points in section 3 (above), it is decided that aspects of the incident do not warrant producing a safety alert for wider distribution, then the internal investigation can be concluded. Where company procedures require an in-house safety alert to be produced, it should be clearly marked for internal use only.

5. YES - DRAFT A SAFETY ALERT IN ACCORDANCE WITH THE SAFETY ALERT PROTOCOL REQUIREMENTS

If after considering all the points in section 3 (above), the decision is to proceed with drafting a safety alert, this should be carried out in consultation with the owner, rental company or manufacturer, particularly if they will be identified, or have their product identified in the alert.

Content of a safety alert

It is important that any safety alert contains sufficient specific and relevant information to avoid misinterpretation or unnecessary consequences. Such information as a minimum should include:

- a. Unique reference/issue number - footnoted on all pages and all pages numbered;
- b. Date of publication;
- c. Name and contact details of person issuing the alert;
- d. Intended target audience of the safety alert;
- e. Type of safety alert – action recommended or for information only;
- f. Actual date of incident;
- g. Location of incident;
- h. Equipment manufacturer and model involved - if relevant;
- i. Brief factual description of task being performed;
- j. Brief description of occurrence/incident - any photographs should be of the actual incident and accurate;
- k. Significant, relevant findings of investigation – factual and without apportioning blame;
- l. Recommended actions (if any see e);
- m. Status of the investigation – concluded or ongoing;
- n. Statement declaring the document is drafted in accordance with the MEWP safety alert protocol.

Where it is felt necessary to issue a safety alert during an investigation and before it has been concluded, this should:

- Be made clear in the original safety alert (reference n. above);
- Where required, be followed up with a 'close-out' communication when the investigation has been concluded.

Content of any close-out communication

- i. Unique reference/issue number - footnoted on all pages and all pages numbered;
- ii. Date of current communication;
- iii. Reference to any previous safety alert(s) issued regarding the incident quoting original reference information and original date of publication;
- iv. Copy of or summary of content of the original alert;
- v. Name and contact details of person issuing the close out communication;
- vi. Intended target audience – this should be the same as the original alert;
- vii. Status of original safety alert – current or withdrawn;
- viii. Further actions required – if any;

- ix. Reference to bulletins from relevant parties (where issued) e.g. HSE, Manufacturer, Rental Company.

6. SAFETY ALERT APPROVED AND DISTRIBUTED

The issuing of a safety alert should only be done with the knowledge, approval and authorisation of a company senior manager. It is strongly recommended that a copy of the safety alert is sent in advance of publication (allowing sufficient time for a response), to any company or person, who may be named, or has their product identified in the safety alert. As a minimum include them and other named parties in the circulation list, when the safety alert is issued and send a copy of the agreed safety alert to the HSE Complaints and Advice Team (CAT Team).

<http://www.hse.gov.uk/contact/concerns.htm>

With all of the modern means of communication currently available, worldwide distribution of a document is only a few 'clicks' away.

Remember, once a safety alert has been issued and is in the public domain, it is impossible to retract. Before issuing a safety alert it is essential to:

- a. Double check the content for factual accuracy and relevance;
- b. Reconsider the criteria for and against publication outlined in 3;
- c. Measure against the intended purpose of the safety alert;
- d. Be specific and clear about circulation.

REMEMBER: Internal company circulation is no guarantee that the document will not be shared outside the intended audience, hence the importance of clearly marking 'FOR INTERNAL USE ONLY'.

7. THINGS TO CONSIDER WHEN RECEIVING A SAFETY ALERT AND BEFORE FORWARDING

Upon receiving a safety alert, it is essential to consider the relevance and importance of the alert, before deciding to forward to others or circulate internally. Inappropriate action may be counterproductive for reasons identified in the introduction of this MEWP safety alert protocol document.

Things to consider when receiving a safety alert:

1. Are the actions/information of the alert relevant to your company, supply chain, or known and relevant external parties?
2. Does the safety alert adhere to the MEWP safety alert protocol? If not, contact the author and consider informing any relevant manufacturer or other interested parties;
3. Is the information current or has an update been issued? If in doubt, contact the author of the alert to confirm.


Things to consider before forwarding on a safety alert:

1. Carefully consider whether further distribution is necessary;
2. Clearly identify why and to whom you feel further distribution is of value;
3. Consider the intended outcome of forwarding the alert.

If after having considered all the above points, it is felt necessary and beneficial to forward the safety alert, the following rules should be applied:

- Only circulate the alert in its original format;
- Include any extra text or explanation on an additional cover sheet;
- Do not add additional information or hearsay to the text of the original alert.

EXAMPLE TEMPLATE FOR A MEWP RELATED SAFETY ALERT

| | | | | |
|---|--|--|--|-------------|
| COMPANY LOGO: | | SAFETY ALERT |  | |
| SUBJECT OF ALERT: | | | REFERENCE NO: | |
| LOCATION OF INCIDENT: | PURPOSE OF ALERT: FOR INFORMATION ONLY or ACTION (reference RECOMMENDED ACTIONS). | DATE OF INCIDENT: | | |
| EQUIPMENT INVOLVED: MANUFACTURER/TYPE/MODEL | INVESTIGATION STATUS ONGOING/CLOSED | ALERT ISSUE STATUS: INTERIM ALERT CLOSE OUT | | |
| BRIEF FACTUAL DESCRIPTION OF THE TASK BEING PERFORMED: | | ADD ANY RELEVANT PICTURES HERE: NOTE - ANY PICTURES MUST BE OF THE ACTUAL INCIDENT AND/OR MACHINE INVOLVED. | | |
| BRIEF DESCRIPTION OF OCCURRENCE/INCIDENT: | | | | |
| SIGNIFICANT OR RELEVANT FINDINGS: | | | | |
| RECOMMENDED ACTIONS: | | | | |
| | | | | |
| AUTHOR'S NAME: | CONTACT E-MAIL ADDRESS: | | | |
| INTENDED CIRCULATION: RESTRICTED/INTERNAL/GENERAL | | DATE OF PUBLICATION: | | |
| <p>THIS SAFETY ALERT HAS BEEN PREPARED IN ACCORDANCE WITH SFPSG SAFETY ALERT PROTOCOL A copy of the protocol and template can be downloaded from www.cpa.uk.net and www.ipaf.org</p> | | | | |
| Alert reference number | | Date published | | Page x of y |